
Fort Belknap Indian Community Environmental Department: Five-Year Strategic Plan



Final – September 2003

MISSION:

"With respect to the unique cultural values of the White Clay and Nakota Nations, the mission of the Fort Belknap Environmental Department is to ensure the Fort Belknap Reservation and the people are protected from harmful levels of pollution. The Fort Belknap Environmental Department will acquire the skills and capacity to adequately protect and enhance the cultural and natural resources including the air, land, water and biodiversity through an appropriate balance of environmental rules, regulations and educational opportunities guided by our tribes' cultural values".



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List of Acronyms

BIA	Bureau of Indian Affairs
CAA	Clean Air Act
CWA	Clean Water Act
EPA	U.S. Environmental Protection Agency
FBC	Fort Belknap College
FBCC	Fort Belknap Community Council
FBIC	Fort Belknap Indian Community
FBICED	Fort Belknap Indian Community Environmental Department
FBED	Fort Belknap Environmental Department
GAP	Indian General Assistance Program
GIS	Geographical Information System
NAAQS	National Ambient Air Quality Standards
NTAA	National Tribal Air Association
WRAP	Western Regional Air Partnership



Preface

This Strategic Plan is meant to provide the Fort Belknap Indian Community (FBIC) with a guide for developing its environmental management capacity over the next five years. Due to the nature and complexity of environmental protection, a well thought-out and planned process for development is necessary. Developing environmental protection programs in Indian Country takes dedication, commitment, and a dependable source of adequate funding. It also requires that decision makers and community members be well informed and prepared to make important decisions about the future desired conditions of the reservation.

The development and implementation of Environmental Programs in Indian Country require large allocations of time and resources. Complementary state and federal programs have taken many years of dedicated, hard work to create, and it will take continued efforts to maintain and enhance the capacities of each. In order to stay abreast of these ever-changing programs, FBIC will need the personnel and funding to maintain an experienced Environmental Department.

FBIC has the unique challenge of finding ways to develop its programs with fewer tools, and less money than its counterparts were afforded. Increasing this challenge is the constant effort to protect its rights and sovereign status from encroachments by the state. The development of comprehensive environmental programs in Indian Country is further limited by three main factors:

- 1) Lack of resources, both financial and human,
- 2) A complex legal and jurisdictional tapestry, and
- 3) The perceived and sometimes real threat, that environmental regulations adversely impact economic development.

The financial, legal and jurisdictional issues will remain a source of constant pressure and concern for many years to come. It is up to the Fort Belknap Indian Community Environmental Department (FBICED) to be creative in its pursuit of public education and ensuring that tribal leadership continue to be well-informed about the importance of environmental protection to the future of their people and the economic prosperity they seek. Despite these challenges, the FBIC has demonstrated a commitment to building its environmental capacity and to the protection of its people and land.

This Strategic Plan does not answer all of the difficult questions facing the FBIC; nor does it provide solutions to all the complex problems we face. However, it does provide a logical framework when applied, will assist the FBIC to meet more realistic near term goals such as, building the Tribes' capacity to operate a comprehensive environmental department.

Success will come when the Tribal leadership and managers understand the importance of environmental protection and are committed to the goals and objectives of this Plan. Additionally, the Environmental Department staff must remain focused on their individual programs and constantly make progress toward meeting their goals.

Planning is a process, not a single activity. The Department must therefore continue to evaluate and modify its program to ensure that all the lands and people of the Reservation are protected from harmful levels of pollution, and other environmental impacts that might affect the quality of life on the Reservation. Finally, public outreach and education may be the best opportunity for successful environmental protection over the long-term, on the Reservation.

Introduction

Since 1991, efforts to address environmental issues on the 679,617.18-acre Fort Belknap Indian Reservation have been made on a project-by-project basis. Water quality, wetlands, air quality, solid waste, lead paint, and Brownfields have been the focus. In the early years, the environmental focus was largely aimed at the Zortman-Landusky mine site located on the south slopes of the Little Rocky Mountains and bordering the current reservation (this area is of great importance to the Tribes. Today many people maintain that the Zortman-Landusky mine site was essentially stolen from the tribe around 1900). Pegasus Gold extracted over \$300 million in gold and silver from the mine until its closure in the late 1990's. While the gold is not completely exhausted, Pegasus claimed the costs to operate the mine in an environmentally protective manner prohibited them from further extraction; they filed for bankruptcy protection shortly after. Today, the mine and its heap leach piles are evidence of nearly 100 years of gold mining with little or no environmental control. The people of the Fort Belknap Indian Community and the surrounding areas are left to cope with the damages and legacy of this boom-and-bust industry.



As the Department has grown from one staff person in 1991, whose primary mission was to monitor the Zortman-Landusky Mine, to over 11 today, so has their need to better coordinate and plan environmental protection efforts. The FBIC have made some planning efforts over the past several years. Most recently, the FBICED was tasked with

developing a plan of activities for the next five years.

This document highlights the steps of the planning process with a special emphasis on the newly created mission of the FBICED. Core values that will ultimately guide the Environmental Department, and the key factors that were identified by the participants of the Strategic Planning session, are emphasized. Each program specialist developed a specific program purpose and has identified short and long-range objectives that are also listed.

The Strategic Plan

The purpose of the Five-Year Strategic plan is to identify and implement high priority environmental protection goals over the next five years. The plan will be used as a tool to help the FBICED focus and direct its activities towards the highest priority areas. This Plan describes a number of objectives that will be the focus of the Environmental Department over this time. It also provides a prioritized description of activities necessary to meet these goals.

While the Plan seeks to formalize and guide the efforts of the FBICED, it also seeks to:

- Ω Improve coordination within the Tribes' programs on the Reservation, among other stakeholders, and with external regulators by putting plans on paper;
 - Ω Promote cooperation through outreach efforts utilizing a multimedia approach for environmental protection;
 - Ω Make the best and wisest use of existing resources to address environmental priorities;
 - Ω Serve as a basis to leverage outside resources to support environmental programs and actions; and
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- Ω To ensure that a mechanism exists for providing information to the Tribal Council, the populations on the Reservation, and the U.S. Environmental Protection Agency (EPA).

This Plan is the result of the continued commitment of the Fort Belknap Community Council (FBCC), the FBIC Environmental Department, and the USEPA. Over the next five years, collaboration will be critically important to maintain a framework of participation and cooperation. Ongoing coordination and cooperation between the Tribes, the USEPA, and members of the public will be key to accomplishing the environmental protection goals, the conservation of natural resources, and the resulting benefits to public health.

The goals that cut across all Environmental Department programs are:

- Ω Continue to build internal capacity so the Environmental Department can protect the people of the reservation and the environment from harmful levels of pollution;
- Ω Enhance the educational and outreach strategies for each program and deliver accurate, culturally sensitive information;
- Ω Share information so as to promote the most wise use of time and resources;
- Ω Coordination between programs, educational institutions, other agencies, and tribal programs;
- Ω Maintain a focused effort to keep the Tribal leadership apprised of the needs and duties of the Environmental Department.

Strategic Planning Process

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As previously illustrated, strategic planning is not new to the FBICED. In fact, the Department has a list of projects and activities that were generated through a strategic planning type process in 2002.

A document was created that contains a number of important measures and key activities important to the FBIC. The existing plan is divided into three main sections: *Vision, Needs and Barriers*, and *Directions and Attributes*.

While it contains useful information, it lacks key fundamentals including: a mission and achievable objectives. The initial strategic plan coupled with the Tribes overall Strategic Plan and this Plan, will provide the FBICED with a sound basis for future program development and decision-making.

The new five-year strategic plan began with a two-day planning session in Havre, Montana April 23 and 24, 2003. Havre, Montana was selected because of its relatively close proximity to the Reservation, its access to a meeting facility, and the need for staff members and others to retreat from their duty stations and the challenges of their daily routine. By selecting a site away from the Tribal Office, the participants were able to concentrate on the planning tasks and were not encumbered by interruptions or other routine demands on their time.

A private, Indian owned contractor, Portage Environmental Inc., was selected to conduct the two-day planning process. Tony Bynum facilitated the planning activities. Mr. Bynum, a tribal member of the Confederated Tribes of the Grand Ronde, is a trained facilitator and has many years of planning and tribal environmental program development experience at both the tribal and federal levels. Mr. Bynum's knowledge of environmental protection in Indian Country, and tribal issues, coupled with the participant's willingness and ability to share

thoughts and ideas helped to make this an effective process.

The facilitator began the two-day event with a short explanation of the purpose for planning and a description of critical issues to consider when developing a tribal environmental program (the agenda is attached as Appendix A). The Environmental Department's history was then examined followed by an "Environmental Scan." An Environmental Scan is a process that helps the participants identify Strengths,

Weaknesses, their Opportunities for success, and threats or obstacles to that success. The remainder of the planning process was devoted to developing a Mission statement and a series of objectives for each project within the Environmental Department. New projects and or directions were not given a great deal of consideration because it was the desire of the Manager to focus on existing programs and projects that were "doable" under the existing structure. As a first step in the planning process, the participants developed a mission and some core values for the Department.



Mission

"With respect to the unique cultural values of the White Clay and Nakota Nations, the mission of the Fort Belknap Environmental Department is to ensure the Fort Belknap Reservation and the people are protected from harmful levels of pollution. The Fort Belknap Environmental Department will acquire the skills and capacity to adequately protect and enhance the cultural and natural resources including the air, land, water and biodiversity through an appropriate balance of environmental rules, regulations, and educational opportunities guided by our tribes cultural values".



Core Values

The following principles and philosophy were developed to guide the FBICED:

resources.

Protection and Development

The Environmental Department is committed to protecting public health and the environment, restoring and conserving natural resources, protecting cultural resources, and enhancing the economic vitality of the Reservation.

Integrity and Respect

The Environmental Department is committed to truth, accuracy, and fairness, and is respectful of language, cultural and economic differences.

Cooperation and Collaboration

The Environmental Department is committed to a partnership that will work toward a common vision, establish open communication and share knowledge and information, science and technology, and staff

Continuous Improvement

The Environmental Department is committed to continuously improve and update its efforts to maintain a clean environment, and to incorporate technological innovations and enhancements to the programs

dedicated to the protection of the environment.

Public Participation and Communication

The Environmental Department is committed to engaging the Reservation communities and utilizing their participation.

Common Issues of Each Project Area

The planning process unveiled several key issues needing further consideration, as they are common to all of the FBIC environmental programs. These include:

- 1) Completing activities that will establish FBIC authority and capacity to write rules;
- 2) Exercising enforcement policies and procedures;
- 3) Operating an effective compliance program;
- 4) Record keeping and data acquisition and management, are critical to administrative success of the Department; and
- 5) Performing outreach, education, and public involvement are important factors and offer unique challenges that must also be addressed.



Technical, Legal and Policy, and Administrative Capacity

The ability of each program to function properly is limited by the technical, legal and administrative capacity of both the Department and the Tribal Government. Progress toward building a comprehensive environmental department can remain steady but it is important for each program to strive to fill existing deficiencies. Continued personal advancement that enables the programs and the Department to meet their goals will not be overlooked during regular personnel evaluations. Continuing education and technical training are strongly recommended, and supported by the current Program Director.

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The FBIC plans to make it a priority to hire the Tribes' members to fulfill many of its duties. The Tribes and the current Department Director realize that they must make personal educational growth a priority by providing the opportunities and rewards to employees who improve themselves and help the program achieve its overall mission. This "capacity building" approach requires each person the opportunity to continuously strengthen his or her skills and abilities. There are a number of opportunities to advance personal skills. Some of these include:

- Ω Attending the local tribal college.
- Ω Participating in long-distance learning via the Internet,
- Ω Participating in training courses offered by the EPA and organizations like the Institute for Tribal Environmental Professionals.

There are also numerous private consultants and corporate businesses that can deliver quality, on-site training tailored to meet specific needs.

Outreach, Education, and Public Involvement

Outreach, education, and public involvement are issues important to all of the programs

within the FBICED. Each program shares similar challenges and opportunities when considering public involvement for environmental matters. The Department strives to include the "public" and Tribal leadership in its planning activities and outreach events. However, its actions have generally met with little success due to poor public attendance and consequently little outside participation.

The Department identified disinterest by the public as the primary reasons for a lack of participation in its program events. For example, in April 2003 the Department held its annual Earth-Day event in conjunction with national earth-day. They were quite disappointed with the lack of turnout. Similar efforts have been made to involve community members in public meetings related to environmental issues. Public meetings were developed and scheduled to provide information and to elicit input from community members. However, due to poor attendance, the Department could not obtain important public input. Increased public involvement in Departmental activities and expanding participation at open meetings was identified by the FBICED as high a priority issue.

The Department plans to focus on developing a customized outreach strategy for the Reservation. Items identified to include in the strategy are:

- 1) Using local media outlets or other mechanisms, to provide notice for gathering locations,
- 2) Where and when people will gather,
- 3) Opportunities for Department personnel to access the leadership,
- 4) Community wants, needs, and desires, and
- 5) A very clear message for delivery.

Each program must develop individualized presentations, programs, news articles, or public addresses to provided announcements to the Community. The immediate training

needs of the Environmental Department staff include:

- Ω How to develop and deliver multi-media presentations with PowerPoint. PowerPoint training should be delivered to the entire staff within the first year of the plan;
- Ω How to effectively deliver outreach and education materials. Each person should receive some training on effective outreach and education within the first year of this plan,
- Ω Chemical and biological monitoring,
- Ω Field sampling methods,
- Ω Analytical methods, and
- Ω Mathematics.

Program-Specific Strategic Objectives

The FBICED is a compilation of many individual project type activities with their own unique objectives. The Mission unifies the projects into one Department. The projects, or programs that make up the Department include:

1. General Assistance Program (GAP)
2. Water Quality Program
3. Wetlands Program
4. Air Quality Program
5. Brownfields Demonstration Project
6. Data Management and Mapping

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Indian General Assistance Program (GAP)

The Indian General Assistance Program (GAP) grants are used to maintain the administrative components of the overall Environmental Department. It provides resources to support the Directors Salary and an administrative assistant.

PURPOSE: *The purpose of the General Assistance Program (GAP) is to provide the resources for an environmental presence on the FBIC Reservation, building department capacity, research and legal/regulatory support, and program management and administration.*

OBJECTIVES:

1-2 years

- Ω Hire a Geographical Information Specialist/Technician that can maintain a database and can provide the Department with up-to-date maps of the Reservation.
- Ω Increase understanding and communication effectiveness between the Department and Region 8 EPA, and develop a specialized process for Government-to-Government Consultation
- Ω Within the next two years, the Department will have the hardware to support a basic data management and archival system.
- Ω Purchase a large format plotter that can produce color maps of the reservation.
- Ω Ensure that the Department has the most qualified and well-trained staff by providing employees with access to training opportunities.
- Ω Support Tribal Solid Waste Program by providing resources to assist with purchasing Dumpsters and implementation of a Reservation-wide recycling program.
- Ω Conduct at least one environmental related radio address or announcement per quarter. The messages will vary, but the purpose is to provide the community with updated information about environmental protection on the Reservation thus increasing their awareness of the program.
- Ω Publish a short news letter/bulletin for the community that describes the Departments' activities, discusses important community issues, and describes the unique aspects of the Department.

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Ω Be sure that all proposed projects that affect the FBIC Environment have adequate and proper environmental review. Hire, or assist the Tribes with hiring an environmental (NEPA) Review Coordinator.

Ω Provide opportunities to staff for acquiring technical and scientific training

3-5 Years

Ω Establish the administrative and legal support to develop an application for Federal Water Quality Standards.

Ω Apply to the EPA and receive approval of the FBIC water quality standards.

Ω In years 3-5, the Department will expand the capacity of its data management system to allow for additional access and use of necessary data. The Department will also continuously update and manage the Data sets so as to meet the requirements of the Quality Assurance Plan.

Ω Conduct at least one radio address or announcement per quarter that provides the community with general information about the Water Quality program.



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OBJECTIVES:

1-2 years

- Ω To ensure data is available to the USEPA and a national audience, update and maintain data entry into the STORET National Data Base.
- Ω Develop and undertake a study of the macro invertebrates found in the Reservation waters.
- Ω Quantify and assess the conditions of the Reservation waters.
- Ω Maintain an up-to-date chemical and biological sampling plan and conduct routine water quality sampling on priority waters.
- Ω Provide the most accurate information about the conditions of the Reservation waters. Seek additional technical assistance from the EPA.

Water Quality Program

PURPOSE: *To understand the cultural, chemical, biological, and physical characteristics of the waters of the Reservation and to provide the Department with scientific water quality analysis, monitoring, study design and procedures. The water quality program administers the Clean Water Act Section 106 grant from the EPA.*



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- Ω Hire one water quality specialist.
- Ω Acquire additional training in water resources policy, grant writing and stream measurements.
- Ω Contact the United State Geological Survey and the BIA and develop a consistent means for measuring the quantity of water resources of the Reservation.
- Ω Operate stream-gauging stations
- Ω Provide the community and the educational institutions on the Reservation with water quality

educational materials including a newsletter.

- Ω Develop access to the most accurate and reliable water quality laboratory services by investigating the development of a tribal water quality lab and/or explore the opportunity to share the existing laboratory at the Fort Belknap Community College.

3-5 years

- Ω The water quality program desires to ensure that people have access to the most up-to-date information. The FBICED will develop a system for sharing information with and between, other entities including the Fort Belknap College and the Tribal Environmental Health Department.
 - Ω Update and purchase tools and monitoring equipment.
 - Ω Maintain a strong working relationship with the educational institutions on the reservation and with other tribal colleges in the region.
 - Ω Acquire needed technical training in analytical chemistry, water quality sampling, and Hydrology.
 - Ω Maintain existing equipment and update the quality assurance and quality control sampling plans.
 - Ω Continuation of monitoring efforts on Reservation waters to measure changes in water quality and to allow for mitigation of issues affecting it.
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Wetlands Program

PURPOSE: *To ensure that the Reservations' wetlands are inventoried, assessed and properly protected from harm due to disruptions in flow, poor land management practices, chemical pollution, or other physical and biological degradation. The wetlands program is an extension of the water quality program that specifically address issues related to the Clean Water Act Section 104(b)(3).*

OBJECTIVES:

1-2 Years

- Ω To develop the capacity to operate a comprehensive wetlands management program.
- Ω Implement the Tribes Aquatic Resources Protection Ordinance.
- Ω Continue to seek funding for additional staff support by requesting additional funds in new EPA grants, or seek other sources funding.
- Ω Map all wetlands with Global Positioning System. Enter data into a secure database.
- Ω Conduct a functional assessment of the Reservation wetlands using existing functionality protocol.
- Ω Conduct random water quality sampling at selected sites on the Reservation.
- Ω Collect and identify the vascular plants associate with wetland communities on the Reservation. Maintain a herbarium of collected plant species.
- Ω Research monitoring techniques for wetlands.

- Ω Research wetlands mitigation and restoration methods/techniques.

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3-5 years

- Ω Develop a local functionality assessment protocol/methodology specific to the water bodies of Reservation [bio-assessment method].
- Ω Update wetlands inventory.
- Ω Develop an intern program to research and catalogue amphibians found on the Reservation.
- Ω Bird Identification and monitoring study.



Air Quality Program

The air quality program is made up of one staff person and a contract with Portage Environmental, Inc. The program operates under an existing Clean Air Act Section 103 grant from the EPA.

PURPOSE: *To assess the ambient air resource of the Reservation and to develop a program that will minimize the impacts of air pollution to the Reservation Population. Currently the program is assessing the air quality and air quality concerns of the Reservation. In the future, the FBIC Environmental Department plans to operate a regulatory air quality program.*

OBJECTIVES:

1-2 Years

- Ω Develop and present to the Council for their review and approval, an open burning and fugitive emissions ordinance.
- Ω Conduct research into the community values of air quality. Understand how the community values the air resources.
- Ω Acquire contract support for overall air program tasks.
- Ω Maintain an accurate and up-to-date inventory of the air pollution sources on the Reservation.
- Ω Update the existing Emissions Inventory based on 2002 data and include information related to sources in Canada.
- Ω Maintain an accurate and up-to-date inventory of the air pollution sources not located on the Reservation but

that may contribute to Reservation air pollution.

- Ω Develop an intern program utilizing the program at the Institute for Tribal Environmental Professionals.
- Ω Review all project proposals for air quality issues. Make comments and recommendations that protect the reservation communities from harmful levels of air pollution. [This may require additional technical support as necessary]. Possible projects include:
 - Target Range
 - Highway 2 Expansion
 - Ethanol Plant
- Ω Investigate the opportunity to provide the Reservation Communities with a wood-stove buy back program that would help reduce the levels of smoke and particulate matter.
- Ω Develop and deliver education materials to the public and the education institutions on the Reservation. Key issues include:
 - Open Burning
 - Wood Stove Smoke
 - Trash/Burn Barrels
 - General air pollution health concerns and ways to reduce exposure.
 - Dust from construction, dirt roads, and agricultural practices.
- Ω Join and attend periodic meetings of the National Tribal Air Association [NTAA].
- Ω Join and attend periodic meetings of the Western Regional Air Partnership [WRAP].
- Ω Research history of Radon on the Reservation. Based on the

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conclusions of this effort, conduct Radon sampling and report findings of radon samples.

- Ω Investigate the existence of asbestos in government facilities, homes and schools. Ensure that existing asbestos sites have an up-to-date management plan and that it is being properly implemented and monitored.
- Ω Participate with the USEPA, and make recommendations as to the classification of the Reservation air shed for the purposes of National Ambient Air Quality Standards [NAAQS].
- Ω Conduct a one-year particulate matter (PM) saturation study on the southern end of the Reservation.

- Ω Survey indoor air quality starting with the elderly care programs, hospital, and administrative buildings.

- Ω Conduct a survey of mold in houses or public buildings on the reservation.



3-5 Years

- Ω Maintain and update Emission Inventory as necessary.
- Ω Conduct a one-year particulate saturation study of north end of the Reservation.
- Ω Continue to review proposals that may contribute to air pollution on the reservation or that may impact the residents of the reservation.
- Ω Research and report on the opportunities for the development of a noise pollution ordinance.
- Ω Implement an air quality ordinance for the Reservation.
- Ω Understand the air pollution of the reservation to ensure air program activities are addressing the highest priority issues.

Brownfields Demonstration Project

The Brownfields Pilot Project consists of one project coordinator and contract services. FBED have successfully assessed several sights and is in the process of developing reclamation plans. The Brownfields project will continue to seek additional funds and support to assess additional sites on the reservation.

PURPOSE: *As a model program in Indian Country, this program shall assess the conditions of the Snake Butte Rock Quarry and the Old Agency Landfill sites to protect the health of the residents on the reservation.*

OBJECTIVES:

- Ω Seek additional community input by attending or holding at least one event where Brownfields is the topic of discussion.
 - Ω Design and deliver a community wide radio address explaining the Brownfields Project.
 - Ω Develop a PowerPoint presentation of the project for delivery to a wide audience of members and non-members.
 - Ω Attend training in Public Speaking
 - Ω Attend training in organic chemistry
 - Ω Attend grant Writing Workshop
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- Ω To successfully complete the current Brownsfields Demonstration Project by finalizing Phase III, clean up of the Snake Butte and Old Agency sites.
 - Ω Research and locate sources of funding to complete the site assessments at four other Brownfield locations.
 - Ω Acquire Brownfields Clean-up funding.
 - Ω Secure a Job Training grant for educating low income and unemployed and under-employed enrolled tribal members in Hazardous Materials handling and remediation technologies.
 - Ω Design additional outreach materials that will enhance the current outreach initiatives.

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Data Management and Mapping

Much of the activities under data management could be funded through individual grants. However, the GAP program has made it a priority to expand the Data Management and GIS Capacity of the Department. Each of the programs that utilize the data management and mapping capacity of the Department should contribute proportionately to maintain the service.

PURPOSE: *The purpose of the Data Management and Mapping program is to provide the Department and others with accurate information about the reservation environment and to make available maps of the reservation. In the long-run, the data management and mapping program will have the capacity to conduct spatial analysis and deliver quality, up to date and accurate maps of the Reservation.*

OBJECTIVES:

1-2 Years

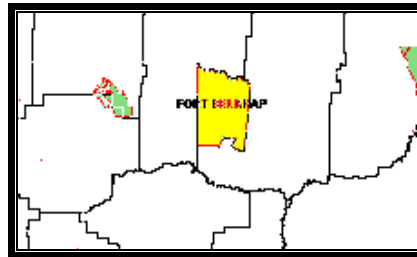
- Ω Hire a Geographical Information Specialist/Technician that will maintain a database and provide the Department with up-to-date maps of the Reservation area.
- Ω Within the next two years the Department will have the hardware to support a basic data management and archival system.
- Ω Provide GPS/GIS Technology training for GIS Specialist/Technician and other FBICED staff to enhance and strengthen staff capacity in data management and mapping.

3-5 Years

- Ω In years 3-5 the Department will expand the capacity of its data management system to allow for additional access and use of the data.

- Ω The Department will also continuously update and manage the Data sets so as to meet the requirements of the Quality Assurance Project Plan (QAPP) of each media-specific area.

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Summary and Conclusions

This Strategic Plan is meant to provide the Fort Belknap Indian Community Environmental Department with a guide for developing its environmental management capacity over the next five years. Due to the nature and complexity of environmental protection, a well thought-out and planned process for development is necessary.

Many questions exist, and this Plan does not answer them all but, it will provide a logical "road-map" that when followed will help the FBIC meet its more near term goals to build the capacity necessary to operate a comprehensive environmental department. The overall goal of the Tribes is to develop a regulatory program that can effectively protect the Reservation and its citizens from harmful levels of pollution. Regulatory development is a complex task and will require significant allocation of time, talent and money. The FBICED plans to develop the capacity to operate a regulatory program after establishing the necessary technical skills. Data collection and proper community education are also critical to the establishment of a fully functional environmental department.

For success to be realized it will be important for the Tribal leadership and its management to understand the importance of environmental protection and to remain committed to the goals and objectives of this

Strategic Plan. Additionally, each staff person must stay focused on their individual programs and make constant progress toward the goals and completing the objectives.

Planning is a process. To maintain constant progression toward the ultimate goal of ensuring that all lands and people of the Reservation are protected from harmful levels of pollution, it must be continuously assessed and updated. Lastly, the FBICED must continue to evaluate its progress over time, by reviewing the Plan, updating it as necessary, and re-planning as conditions change. At the time that individual tasks in this plan are ready for implementation, task specific planning may be necessary to develop strategies for their success and to ensure that successes can be reproduced over the course of time.

